



Wisconsin Legislative Council

RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 21-029

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

2. Form, Style and Placement in Administrative Code

a. Instead of repealing and recreating s. NR 10.11 (2), the agency could amend that provision by moving the existing language to s. NR 10.11 (2) (a) and by creating a new s. NR 10.11 (2) (b) with the language in SECTION 2 of the proposed rule. Repealing and recreating provisions is generally disfavored except in cases of major changes. [s. 1.04 (5), Manual.]

b. Are additional modifications required to ch. NR 10 to reflect the agency’s issuance of carcass tags and harvest authorizations by subunit as described in the proposed rule? For example, should s. NR 10.111 (5) or (6) be modified to reflect consideration of subunits within zones? Additionally, when referring to such subdivisions, the agency should consistently use either the term subunit or subzone throughout the rule text and analysis.

c. Generally, titles indicated in the proposed rule, in SECTIONS 2 and 4, should end with a period.

4. Adequacy of References to Related Statutes, Rules and Forms

In the Summary of Factual Data and Analytic Methodologies used, the agency should further explain how the agency’s elk management goals will be affected by creating a single, extended elk season, reducing the population goal in the Central zone, and providing a range of population goals for each zone. For example, what is the intended effect of expressing a population goal as a range, in relation to the number of licenses issued?

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. Rather than listing elk population goals as “+/- 20%”, should the agency simply write out the current goal? For example, “300 +/- 20%” can also be written as “240 to 360”.

b. In the agency’s discussion of Zone X in SECTION 4 of the proposed rule, “Central” should be underscored.